USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 1 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of)	
the Unsupervised ESTATE OF TROY DEAN)	
POWNELL, Deceased,)	
)	
Plaintiff,)	
)	
V.)	
) CAUSE NO.: 4:25-cv-0043	
ROBERT GOLDSMITH, in his official capacity as)	
Sheriff of Tippecanoe County; THOMAS LEHMAN, in)	
his official capacity as Jail Commander of the)	
Tippecanoe County Jail; CARRIE MORGAN, in her)	
individual capacity as Assistant Jail Commander of the)	
Tippecanoe County Jail; PAUL WYANT, in his)	
individual capacity as a jail officer of the Tippecanoe)	
County Jail; BAILEY CLARK, in his individual)	
capacity as a jail officer of the Tippecanoe County Jail;)	
MAKENZIE CHEEVER, in her individual capacity as	,)	
a jail officer of the Tippecanoe County Jail; COLE)	
ZIMMER, in his individual capacity as a jail officer of	ý)	
the Tippecanoe County Jail; QUALITY))	
CORRECTIONAL CARE, LLC; MONICA FLORES,)	
L.P.N., in her individual capacity; and BRIANA))	
FRAZIER, L.P.N., in her individual capacity,))	
110 Ellin, Ellin, in nor marriada capacity,	<i>,</i>)	
Defendants.))	
Defendants.	<i>)</i>)	
	<i>)</i>	

SUMMONS IN A CIVIL ACTION

To: Makenzie Cheever
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 2 of 20

	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 3 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of the Unsupervised ESTATE OF TROY DEAN POWNELL, Deceased,)))
Plaintiff,)
ROBERT GOLDSMITH, in his official capacity as Sheriff of Tippecanoe County; THOMAS LEHMAN, in his official capacity as Jail Commander of the Tippecanoe County Jail; CARRIE MORGAN, in her individual capacity as Assistant Jail Commander of the Tippecanoe County Jail; PAUL WYANT, in his individual capacity as a jail officer of the Tippecanoe County Jail; BAILEY CLARK, in his individual capacity as a jail officer of the Tippecanoe County Jail; MAKENZIE CHEEVER, in her individual capacity as a jail officer of the Tippecanoe County Jail; COLE ZIMMER, in his individual capacity as a jail officer of the Tippecanoe County Jail; QUALITY CORRECTIONAL CARE, LLC; MONICA FLORES, L.P.N., in her individual capacity; and BRIANA FRAZIER, L.P.N., in her individual capacity,)) CAUSE NO.: 4:25-cv-0043)))))))))))))))))))
Defendants.)))

SUMMONS IN A CIVIL ACTION

To: Bailey Clark
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 4 of 20

	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 5 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of the Unsupervised ESTATE OF TROY DEAN POWNELL, Deceased,)))
Plaintiff,)
ROBERT GOLDSMITH, in his official capacity as Sheriff of Tippecanoe County; THOMAS LEHMAN, in his official capacity as Jail Commander of the Tippecanoe County Jail; CARRIE MORGAN, in her individual capacity as Assistant Jail Commander of the Tippecanoe County Jail; PAUL WYANT, in his individual capacity as a jail officer of the Tippecanoe County Jail; BAILEY CLARK, in his individual capacity as a jail officer of the Tippecanoe County Jail; MAKENZIE CHEEVER, in her individual capacity as a jail officer of the Tippecanoe County Jail; COLE ZIMMER, in his individual capacity as a jail officer of the Tippecanoe County Jail; QUALITY CORRECTIONAL CARE, LLC; MONICA FLORES, L.P.N., in her individual capacity; and BRIANA FRAZIER, L.P.N., in her individual capacity,)) CAUSE NO.: 4:25-cv-0043)))))))))))))))))))
Defendants.)))

SUMMONS IN A CIVIL ACTION

To: Monica Flores, L.P.N.
Quality Correctional Care, LLC
12900 North Meridian Street, Suite 140
Carmel, IN 46032

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

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	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 7 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of)	
the Unsupervised ESTATE OF TROY DEAN)	
POWNELL, Deceased,)	
· · ·	ĺ	
Plaintiff,)	
riannin,)	
)	
V.)	
)	CAUSE NO.: 4:25-cv-0043
ROBERT GOLDSMITH, in his official capacity as)	
Sheriff of Tippecanoe County; THOMAS LEHMAN, in)	
his official capacity as Jail Commander of the	ĺ	
Tippecanoe County Jail; CARRIE MORGAN, in her	ĺ	
individual capacity as Assistant Jail Commander of the)	
Tippecanoe County Jail; PAUL WYANT, in his)	
± ±)	
individual capacity as a jail officer of the Tippecanoe)	
County Jail; BAILEY CLARK, in his individual)	
capacity as a jail officer of the Tippecanoe County Jail;)	
MAKENZIE CHEEVER, in her individual capacity as)	
a jail officer of the Tippecanoe County Jail; COLE)	
ZIMMER, in his individual capacity as a jail officer of)	
the Tippecanoe County Jail; QUALITY)	
CORRECTIONAL CARE, LLC; MONICA FLORES,)	
L.P.N., in her individual capacity; and BRIANA)	
FRAZIER, L.P.N., in her individual capacity,	ĺ	
	ĺ	
Defendants.)	
Detendants.)	
)	

SUMMONS IN A CIVIL ACTION

To: Briana Frazier, L.P.N.
Quality Correctional Care, LLC
12900 North Meridian Street, Suite 140
Carmel, IN 46032

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

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	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 9 of 20 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of the Unsupervised ESTATE OF TROY DEAN POWNELL, Deceased,)))
Plaintiff,)
ROBERT GOLDSMITH, in his official capacity as Sheriff of Tippecanoe County; THOMAS LEHMAN, in his official capacity as Jail Commander of the Tippecanoe County Jail; CARRIE MORGAN, in her individual capacity as Assistant Jail Commander of the Tippecanoe County Jail; PAUL WYANT, in his individual capacity as a jail officer of the Tippecanoe County Jail; BAILEY CLARK, in his individual capacity as a jail officer of the Tippecanoe County Jail; MAKENZIE CHEEVER, in her individual capacity as a jail officer of the Tippecanoe County Jail; COLE ZIMMER, in his individual capacity as a jail officer of the Tippecanoe County Jail; QUALITY CORRECTIONAL CARE, LLC; MONICA FLORES, L.P.N., in her individual capacity; and BRIANA))) CAUSE NO.: 4:25-cv-0043)))))))))))))))))))
FRAZIER, L.P.N., in her individual capacity, Defendants.)))

SUMMONS IN A CIVIL ACTION

To: Thomas Lehman, Jail Commander
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

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	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 11 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of)
the Unsupervised ESTATE OF TROY DEAN	
POWNELL, Deceased,	
Plaintiff,)
 ,)
v.)
v.) CAUSE NO.: 4:25-cv-0043
DODERT COLDSMITH in this efficient was its) CAUSE NO 4.23-60-0045
ROBERT GOLDSMITH, in his official capacity as)
Sheriff of Tippecanoe County; THOMAS LEHMAN, in)
his official capacity as Jail Commander of the)
Tippecanoe County Jail; CARRIE MORGAN, in her	
individual capacity as Assistant Jail Commander of the)
Tippecanoe County Jail; PAUL WYANT, in his)
individual capacity as a jail officer of the Tippecanoe)
County Jail; BAILEY CLARK, in his individual)
capacity as a jail officer of the Tippecanoe County Jail;)
MAKENZIE CHEEVER, in her individual capacity as)
· · · · · · · · · · · · · · · · · · ·)
a jail officer of the Tippecanoe County Jail; COLE)
ZIMMER, in his individual capacity as a jail officer of)
the Tippecanoe County Jail; QUALITY)
CORRECTIONAL CARE, LLC; MONICA FLORES,)
L.P.N., in her individual capacity; and BRIANA	
FRAZIER, L.P.N., in her individual capacity,)
• •)
Defendants.)
)
	,

SUMMONS IN A CIVIL ACTION

To: Carrie Morgan
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 12 of 20

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: ______

Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 13 of 20

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of the Unsupervised ESTATE OF TROY DEAN))
POWNELL, Deceased,)
Plaintiff,)))
v. ROBERT GOLDSMITH, in his official capacity as) CAUSE NO.: 4:25-cv-0043
Sheriff of Tippecanoe County; THOMAS LEHMAN, in his official capacity as Jail Commander of the))
Tippecanoe County Jail; CARRIE MORGAN, in her individual capacity as Assistant Jail Commander of the Tippecanoe County Jail; PAUL WYANT, in his)))
individual capacity as a jail officer of the Tippecanoe County Jail; BAILEY CLARK, in his individual capacity as a jail officer of the Tippecanoe County Jail;))
MAKENZIE CHEEVER, in her individual capacity as a jail officer of the Tippecanoe County Jail; COLE))
ZIMMER, in his individual capacity as a jail officer of the Tippecanoe County Jail; QUALITY CORRECTIONAL CARE, LLC; MONICA FLORES,)))
L.P.N., in her individual capacity; and BRIANA FRAZIER, L.P.N., in her individual capacity,))
Defendants.)))

SUMMONS IN A CIVIL ACTION

To: Quality Correctional Care, LLC c/o Lisa Scroggins, Registered Agent 12900 North Meridian Street, Suite 140 Carmel, IN 46032

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 14 of 20

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _______

Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 15 of 20

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of the Unsupervised ESTATE OF TROY DEAN)
POWNELL, Deceased,)
Plaintiff,))
v. ROBERT GOLDSMITH, in his official capacity as Sheriff of Tippecanoe County; THOMAS LEHMAN, in) CAUSE NO.: 4:25-cv-0043
his official capacity as Jail Commander of the Tippecanoe County Jail; CARRIE MORGAN, in her individual capacity as Assistant Jail Commander of the)))
Tippecanoe County Jail; PAUL WYANT, in his individual capacity as a jail officer of the Tippecanoe County Jail; BAILEY CLARK, in his individual))
capacity as a jail officer of the Tippecanoe County Jail; MAKENZIE CHEEVER, in her individual capacity as))
a jail officer of the Tippecanoe County Jail; COLE ZIMMER, in his individual capacity as a jail officer of the Tippecanoe County Jail; QUALITY))
CORRECTIONAL CARE, LLC; MONICA FLORES, L.P.N., in her individual capacity; and BRIANA FRAZIER, L.P.N., in her individual capacity,)))
Defendants.)))

SUMMONS IN A CIVIL ACTION

To: Sheriff Robert Goldsmith
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 16 of 20 If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.
CLERK OF COURT
Date:

Signature of Clerk or Deputy Clerk

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 17 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of)	
the Unsupervised ESTATE OF TROY DEAN)	
POWNELL, Deceased,)	
)	
Plaintiff,)	
)	
V.)	
)	CAUSE NO.: 4:25-cv-0043
ROBERT GOLDSMITH, in his official capacity as)	
Sheriff of Tippecanoe County; THOMAS LEHMAN, in)	
his official capacity as Jail Commander of the)	
Tippecanoe County Jail; CARRIE MORGAN, in her)	
individual capacity as Assistant Jail Commander of the)	
Tippecanoe County Jail; PAUL WYANT, in his)	
individual capacity as a jail officer of the Tippecanoe)	
County Jail; BAILEY CLARK, in his individual)	
capacity as a jail officer of the Tippecanoe County Jail;)	
MAKENZIE CHEEVER, in her individual capacity as)	
a jail officer of the Tippecanoe County Jail; COLE)	
ZIMMER, in his individual capacity as a jail officer of)	
the Tippecanoe County Jail; QUALITY)	
CORRECTIONAL CARE, LLC; MONICA FLORES,)	
L.P.N., in her individual capacity; and BRIANA)	
FRAZIER, L.P.N., in her individual capacity,)	
Defendants.)	
Detendants.)	
)	

SUMMONS IN A CIVIL ACTION

To: Paul Wyant
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 18 of 20

	CLERK OF COURT	
Date:	Signature of Clerk or Deputy Clerk	

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 19 of 20 UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

TROY ALLEN POWNELL, Special Administrator of)
the Unsupervised ESTATE OF TROY DEAN)
POWNELL, Deceased,)
,)
Plaintiff,)
,)
V.)
) CAUSE NO.: 4:25-cv-0043
ROBERT GOLDSMITH, in his official capacity as)
Sheriff of Tippecanoe County; THOMAS LEHMAN, in)
his official capacity as Jail Commander of the))
Tippecanoe County Jail; CARRIE MORGAN, in her))
individual capacity as Assistant Jail Commander of the	,)
Tippecanoe County Jail; PAUL WYANT, in his)
individual capacity as a jail officer of the Tippecanoe	,)
County Jail; BAILEY CLARK, in his individual	,)
capacity as a jail officer of the Tippecanoe County Jail;)
MAKENZIE CHEEVER, in her individual capacity as)
a jail officer of the Tippecanoe County Jail; COLE)
ZIMMER, in his individual capacity as a jail officer of)
the Tippecanoe County Jail; QUALITY)
CORRECTIONAL CARE, LLC; MONICA FLORES,)
L.P.N., in her individual capacity; and BRIANA)
FRAZIER, L.P.N., in her individual capacity,)
110 martiau oupuorty,)
Defendants.	<i>)</i>
Defendants.	<i>)</i>)
	,

SUMMONS IN A CIVIL ACTION

To: Cole Zimmer
Tippecanoe County Sheriff's Department
2640 Duncan Road
Lafayette, IN 47904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) -60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose names and addresses are:

Stephen M. Wagner, Esq. WAGNER REESE, LLP 11939 North Meridian Street, Suite 100 Carmel, IN 46032

USDC IN/ND case 4:25-cv-00043-JEM document 1-2 filed 07/07/25 page 20 of 20

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: ______

Signature of Clerk or Deputy Clerk